

Michael T. Houchin (Bar No. 305541)  
Lilach H. Klein (Bar No. 323202)  
Zachary M. Crosner (Bar No. 272295)  
CROSNER LEGAL, P.C.  
9440 Santa Monica Blvd. Suite 301  
Beverly Hills, California 90210  
Telephone: + 1 (866) 276-7637  
Facsimile: + 1 (310) 510-6429  
lilach@crosnerlegal.com  
mhouchin@crosnerlegal.com  
zach@crosnerlegal.com

*Attorneys for Plaintiff Tinamarie Barrales*

Alexander L. Schultz (Bar No. 340212)  
COVINGTON & BURLING LLP  
1999 Avenue of the Stars  
Los Angeles, California 90067-4643  
Telephone: + 1 (424) 332-4800  
Facsimile: + 1 (424) 332-4749  
aschultz@cov.com

*Attorney for Defendant New Chapter, Inc.*

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

TINAMARIE BARRALES

Plaintiff,

v.

NEW CHAPTER, INC.,

Defendant

Civil No. 2:25-cv-01171-HDV-KES

**JOINT STIPULATION OF  
DISMISSAL WITH PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Tinamarie Barrales, together with Defendant New Chapter, Inc., hereby jointly stipulate to the dismissal of the above-captioned action with prejudice. Each side is to bear its own attorneys' fees and costs.

Dated: September 17, 2025

Respectfully submitted,

/s/ Michael T. Houchin

Michael T. Houchin (Bar No. 305541)  
Lilach H. Klein (Bar No. 323202)  
Zachary M. Crosner (Bar No. 272295)  
CROSNER LEGAL, P.C.  
9440 Santa Monica Blvd. Suite 301  
Beverly Hills, California 90210  
Telephone: + 1 (866) 276-7637  
Facsimile: + 1 (310) 510-6429  
lilach@crosnerlegal.com  
mhouchin@crosnerlegal.com  
zach@crosnerlegal.com

*Attorneys for Plaintiff  
Tinamarie Barrales*

/s/ Alexander L. Schultz

Alexander L. Schultz (Bar No. 340212)  
COVINGTON & BURLING LLP  
1999 Avenue of the Stars  
Los Angeles, California 90067-4643  
Telephone: + 1 (424) 332-4800  
Facsimile: + 1 (424) 332-4749  
aschultz@cov.com

*Attorney for Defendant New Chapter, Inc.*

**Local Rule 5-4.3.4 Certification**

I hereby attest that all other signatories listed, on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

/s/ Michael T. Houchin